

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GENERAL MOTORS LLC;
GENERAL MOTORS COMPANY,

Plaintiffs,

V.

JOSEPH ASHTON,

Defendant.

Miscellaneous No. 22-mc-00027-JLR

**DECLARATION OF CAROLINA
BONILLA GONZÁLEZ IN SUPPORT
OF NON-PARTY MICROSOFT
COPR.’S LCR 37 SUBMISSION
REGARDING REQUESTS FOR
PRODUCTION NOS. 1 AND 2 OF
PLAINTIFFS’ RULE 45 SUBPOENA TO
MICROSOFT CORP.**

I, Carolina Bonilla González declare and state as follows:

1. I am a paralegal at Microsoft Corporation (“Microsoft”), working in the Corporate External Legal Affairs Litigation Department.

2. As a person responsible for responding to the Subpoena Duces Tecum served on Microsoft by plaintiffs, General Motors LLC and General Motors Company (collectively, “GM”) in this matter, I was responsible for overseeing the collection of responsive documents.

3. Attached as Exhibit A is a true and correct copy of the subpoena Microsoft received on or around October 29, 2021, from plaintiffs, General Motors LLC and General Motors Company.

DECLARATION OF CAROLINA BONILLA GONZÁLEZ IN SUPPORT OF MICROSOFT
CORPORATION'S LCR 37 SUBMISSION REGARDING REQUESTS FOR PRODUCTION NOS. 1
AND 2 OF PLAINTIFFS' RULE 45 SUBPOENA TO MICROSOFT CORP. 1

4. Microsoft conducted a reasonable search of its records for non-content data regarding the four Hotmail accounts identified in the above subpoena. Data could only be located data for two of those accounts (collectively, the “accounts at issue”).

5. Microsoft's records indicate, with a high degree of confidence, that both of these two accounts at issue were created by a customer who was in the European Union at the time the account registration information was collected by Microsoft.

6. The relevant data for both of these accounts at issue is stored in the Republic of Ireland, within the European Union.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 15th day of March, 2022 at San Juan, Puerto Rico.

DocuSigned by:

DECLARATION OF CAROLINA BONILLA GONZÁLEZ IN SUPPORT OF MICROSOFT
CORPORATION'S LCR 37 SUBMISSION REGARDING REQUESTS FOR PRODUCTION NOS. 1
AND 2 OF PLAINTIFFS' RULE 45 SUBPOENA TO MICROSOFT CORP. 2